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* ADMITTED IN NY & NJ

April 22, 2025

BY ECF

Honorable Jennifer L. Rochon
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Abraham Kassim
Docket No.: 1:23-CR-0527-2 (JLR)
Request to postpone voluntary surrender

Dear Judge Rochon:

As your Honor is aware, I represent Abraham Kassim, who was previously sentenced by your Honor on January 6, 2025, to one year and a day in jail. Mr. Kassim's voluntary surrender date is scheduled for May 7, 2025.

I am aware that your Honor denied my prior request to postpone Mr. Kassim's surrender date; however, I am asking the Court to reconsider my request. In this Court's prior Order, dated April 17, 2025, your Honor denied the postponement, stating that the medical letters submitted failed to state that the back surgery "must be done at this time," which your Honor felt undermined "the exigency of the...request."

I have attached a new letter, from Dr. Michael Lefkowitz, dated April 21, 2025, in which he explains if Mr. Kassim "does not have surgery, it is highly likely his back pain will worsen and this could interfere with his ability to work." I have also attached the doctor's abbreviated curriculum vitae. Dr. Lefkowitz is saying that Mr. Kassim's back condition, and the resulting pain, will get worse if Mr. Kassim does not have surgery now. Mr. Kassim postponed his surgery scheduled for April 21st because he feared he would not have sufficient time to recoup before surrendering on May 7, 2025.

Given that Dr. Lefkowitz's most recent letter has addressed the Court's concern regarding the exigency and necessity of performing Mr. Kassim's back surgery now, please reconsider your Honor's prior Order, denying Mr. Kassim's request to postpone his date to voluntarily surrender. Mr. Kassim's back surgery is urgent and his conditional will likely suffer considerably while in prison without the surgery.

My prior request asked for four months, but it seems like two months may be sufficient, given that some of the rehabilitation process could be accomplished while in prison. Therefore, I am asking your Honor to postpone Mr. Kassim's May 7th surrender date for at least two months.

Thank you for your attention herein. Please contact me if you have any questions or if you need any additional information.

Very Truly Yours,

LAZZARO LAW FIRM, P.C.

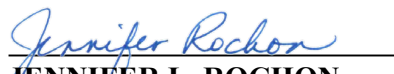
BY: 
LANCE LAZZARO

cc.: AUSA Jaclyn Delligatti
via ECF

Defendant's request for reconsideration is DENIED. As stated in the Court's April 17, 2024 Order, the Court already granted a four-month adjournment of sentencing specifically to accommodate Defendant's spine surgery that was scheduled for November 7, 2024, *see* Dkt. 44 at 1, and Defendant did not subsequently inform the Court of any "upcoming or necessary surgery during the extended sentencing and voluntary surrender scheduling process," *id.* at 3. Moreover, Defendant has not indicated that that the Bureau of Prisons would "not be able to address Defendant's medical needs, including back pain issues, required medications or treatments, and follow up care." *Id.* This resolves the Letter Motion at Dkt. 45.

Dated: April 23, 2025
New York, New York

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge